

From: [Rosenblum, Shelly](#)
To: sarah@uraniumwatch.org
Cc: [BANDROWSKI, MIKE](#); [Christenson, Kara](#); [Glosson, Niloufar](#)
Subject: RE: Canyon Uranium Mine Part 61 Subpart B Approval
Date: Thursday, April 11, 2013 1:31:30 PM

Dear Ms. Fields

The Pinenut mine was approved on April 8, 2011. We have received no other applications. Given the narrow scope of the rule, Subpart B, we had not intended to notice the action for public comment. Thank you for reminding me that Subpart W was delegated to Utah.

Shelly Rosenblum
Radiation & Indoor Environments Teams
U.S. EPA / AIR-6
75 Hawthorne St.
San Francisco, CA 94105
415-947-4193 fax: 3583
rosenblum.shelly@epa.gov

From: sarah@uraniumwatch.org [mailto:sarah@uraniumwatch.org]
Sent: Thursday, April 11, 2013 12:47 PM
To: Rosenblum, Shelly
Subject: RE: Canyon Uranium Mine Part 61 Subpart B Approval

Dear Mr. Rosenblum,

Sorry, I meant Subpart B for the Pinenut Mine. Have you determined whether the Pinenut Mine falls under Subpart B requirements?

Also, it appears from Energy Fuels Resources Annual Report, that both the EZ 1 and EZ 2 mines would produce over 100,000 tons of ore. Have you received an application for Pinenut, EZ 1 or EZ 2 mine? If so, have you approved the applications?

Does Region 9 intend to notice Subpart B applications for public comment if and when such applications are submitted?

Actually, for the White Mesa Mill, it is the Utah Div. of Air Quality that administers and enforces Subpart W. Utah is the only state that administers and enforces Part 61 radionuclide NESHAPS, having assumed authority in 1995.

Thanks,

Sarah Fields

| ----- Original Message -----

| Subject: RE: Canyon Uranium Mine Part 61 Subpart B Approval

From: "Rosenblum, Shelly" <Rosenblum.Shelly@epa.gov>
Date: Thu, April 11, 2013 1:35 pm
To: "sarah@uraniumwatch.org" <sarah@uraniumwatch.org>, "BANDROWSKI, MIKE" <Bandrowski.Mike@epa.gov>

Dear Ms. Fields

Since the mine is separate from the actual mill which is in EPA Region 8, Subpart W doesn't apply to the Pinenut approval. The approval only covers the actual mining operations. All ore will be shipped to the mill. The mill and associated tailings are approved separately by our Region 8 office in Denver.

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From: sarah@uraniumwatch.org [<mailto:sarah@uraniumwatch.org>]
Sent: Thursday, April 11, 2013 12:26 PM
To: Rosenblum, Shelly; BANDROWSKI, MIKE
Subject: RE: Canyon Uranium Mine Part 61 Subpart B Approval

Dear Mr. Rosenblum,

Thanks for your response.

What about Energy Fuels Pinenut Mine on the North Rim with respect Subpart W?

Sarah Fields

----- Original Message -----

Subject: RE: Canyon Uranium Mine Part 61 Subpart B Approval
From: "Rosenblum, Shelly" <Rosenblum.Shelly@epa.gov>
Date: Tue, April 02, 2013 3:39 pm
To: "BANDROWSKI, MIKE" <Bandrowski.Mike@epa.gov>, Sarah Fields <sarah@uraniumwatch.org>

Dear Ms. Fields

We have not received an application for the Canyon mine at this time. In a recent telephone conversation with Energy Fuels Resources we were informed of two things: (1) the Canyon mine is expected to produce less than 100,000 tons of ore*, the quantity which would trigger the need for an application and approval; and (2) despite this, they may decide to submit an application to insure that if the mine did ultimately exceed 100,000 tons,

they would be properly approved. At this time, Energy Fuels Resources and we are assuming that the mine is exempt from 40 CFR Part 61, Subparts A and B. If we receive an application, we will review it accordingly.

* Technical Report on the Arizona Strip Uranium Project, Arizona, U.S.A., prepared for Denison Mines Corp. Report for NI 43-101, Thomas C. Pool, P.E. and David A. Ross, P.Geo. Scott Wilson Roscoe Postle Associates Inc. February 26, 2007

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-----Original Message-----

From: BANDROWSKI, MIKE
Sent: Tuesday, April 02, 2013 2:19 PM
To: Sarah Fields
Cc: Rosenblum, Shelly
Subject: RE: Canyon Uranium Mine Part 61 Subpart B Approval

I am going to pass your message on to Shelly Rosenblum on my staff to respond.

-----Original Message-----

From: Sarah Fields [<mailto:sarah@uraniumwatch.org>]
Sent: Tuesday, April 02, 2013 11:29 AM
To: BANDROWSKI, MIKE
Subject: Canyon Uranium Mine Part 61 Subpart B Approval

Dear Mr. Bandrowski,

Has the EPA Region 9 received a 40 CFR § 61.07 application from Energy Fuels Resources (or the previous owner, Denison Mines Corp.) for a Subpart B underground uranium mine radon source for the Canyon Uranium Mine in Arizona? If so, has the EPA approved that application?

Thank you,

Sarah Fields
Director
Uranium Watch
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Moab, Utah 84532
435-259-9450